Northeast Packaging Co.
Aroostook County
Presque Isle, Maine
A-894-71-C-R (SM)

Departmental
Findings of Fact and Order
Air Emission License
Renewal

FINDINGS OF FACT

After review of the air emissions license application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

Northeast Packaging Company (NPC) of Presque Isle, Maine has applied for a renewal Air Emission License, permitting the operation of emission sources associated with their printing process. The equipment addressed in this license is located at 875 Skyway Street Presque Isle, Maine.

B. Emission Equipment

NPC is licensed to operate the following equipment:

Fuel Burning Equipment *

Equipment	Maximum Capacity (MMBTU/hr)	Fuel Type, %Sulfur	Maximum Firing Rate	Stack height (ft)
Boiler #3	0.8	#2 fuel oil	5.5 gal/hr	28

* Noted for inventory purposes only, less than 1.0 MMBtu/hr heat input.

Process Equipment

Equipment	Max process rate	Date of Manufacture	Date of Installation
Printing Press #1	17,000 ft/hr	1994	1995
Printing Press #2	17,000 ft/hr	1999	2000
Printing Press #3	17,000 ft/hr	1994	2006
(5) Bag Machines *	10,600 lb/day	1994	1995

* One bag machine was installed in 2008 through Air Emissions License Amendment A-894-71-B-A.

Associated Fuel Burning Equipment *

Equipment	Maximum Capacity	Maximum Firing Rate	Fuel Type
Dryer for Press #1	0.8 MMBtu/hr	8.5 gal/hr	propane
Dryer for Press #2	0.8 MMBtu/hr	8.5 gal/hr	propane
Dryer for Press #3	0.8 MMBtu/hr	8.5 gal/hr	propane

* Noted for inventory purposes only, all propane dryers are each less than 1.0 MMBtu/hr heat input.

C. Application Classification

The application for NPC does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of currently licensed emission units only and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (as amended).

With the boiler and dryer heaters each less than 1.0 MMBtu/hr, these units are considered insignificant per 06-096 CMR 115 Appendix B of the Department regulations. For this reason, no emissions from these units are calculated. The facility also operates a Regenerative Thermal Oxidizer (RTO) with a 2.3 MMBtu/hr propane fired burner. Emissions from this unit are calculated based on the maximum licensed fuel limit of 176,000 gallons per year. The VOC and HAP emissions limit keeps the facility licensed below the major source thresholds and below the applicability threshold of VOC RACT, therefore this facility is considered a synthetic minor.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

Process Description

NPC prints and manufacturers multiwall paper bags and printed polyethylene film bags. Currently NPC uses both water based and solvent based inks for printing purposes. The facility was under licensing thresholds using mainly water based inks for many years. However, several customers, including several of the major supermarket stores have required certain product quality and appearance that can only be achieved currently through use of solvent-based inks. NPC is working with new ink suppliers on water-based technology for printing on polyethylene. Water-based inks are improving constantly; however, solvent-based inks are still necessary for current orders.

B. Boiler # 3

Boiler #3 is rated at 0.8 MMBtu/hr and is considered insignificant per 06-096 CMR 115. The boiler fires #2 fuel oil and was installed in 1994. Due to the size of the unit, the boiler is not subject to the New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, for units greater than 10 MMBtu/hr manufactured after June 9, 1989.

There are no specific BPT emission limits or findings. The unit does fire #2 fuel oil, therefore, prior to July 1, 2016, or by the date otherwise stated in 38 MRSA §603-A(2)(A)(3), the #2 fuel oil fired in Boiler #3 shall be ASTM D396 compliant #2 fuel oil (maximum sulfur content of 0.5% by weight). Per 38 MRSA §603-A(2)(A)(3), beginning July 1, 2016, or on the date specified in the statute, the

facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.005% by weight (50 ppm), and beginning January 1, 2018, or on the date specified in the statute, the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.0015% by weight (15 ppm). The specific dates contained in this paragraph reflect the current dates in the statute as of the effective date of this license; however, if the statute is revised, the facility shall comply with the revised dates upon promulgation of the statute revision.

40 CFR Part 63 Subpart JJJJJJ

Boiler #3 fires #2 fuel oil and is rated at 0.8 MMBtu/hr. Hot water boilers (excluding steam units) less than 1.6 MMBtu/hr are covered under the hot water heater exemption. Subpart JJJJJJ is not applicable to units firing gas, hot water heaters, temporary boilers, residential boilers, electric utility steam generating units covered by subpart UUUUU, etc. Therefore, Boiler #3 is not subject to 40 CFR Part 63 Subpart JJJJJJ.

C. Dryers

The combined heat input of the heaters is 2.4 MMBtu/hr with three Maxon dryers each with a maximum heat input of 0.8 MMBtu/hr. These heaters are not subject to 40 CFR Part 60 Subpart Dc and are considered insignificant due to their size per 06-096 CMR 115 Appendix B. To continue status as insignificant sources, NPC will notify the Department if changes occur to the maximum design heat input, fuel type, or stack. Visible emissions shall not exceed 10% opacity on a six (6) minute block average basis.

40 CFR Part 63 Subpart JJJJJJ

The dryers fire propane and are each rated at 0.8 MMBtu/hr. Subpart JJJJJJ is not applicable to units firing gas, hot water heaters, temporary boilers, residential boilers, electric utility steam generating units covered by subpart UUUUU, etc. Therefore the dryers are not subject to 40 CFR Part 63 Subpart JJJJJJ.

D. Printing Press Control System

The original BACT analysis for the printing presses involves researching the most economically and technically feasible add-on control technology. The add-on control system most likely to meet this criteria was the regenerative thermal oxidizer (RTO). Through Air Emission License Amendment, A-894-71-B-A issued March 26, 2008, NPC installed and continues to operate an RTO to reduce volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions when using solvent based inks. To meet BPT, the presses, roll cleaning, and ink preparations at NPC will have a VOC emissions limit of 24.9 tons per year, based on a 12 month rolling total and continued to operate the RTO per manufacturer's

specifications. The VOC and HAP tracking will be based on material usage and VOC and HAP contents specified in Material Safety Data Sheets (MSDS).

NPC is subject to the applicable requirements of 06-096 CMR 132 of the Department's regulations (Graphic Arts-Rotogravure and Flexography), including the requirements for recordkeeping and reporting. This regulation applies to printing press facilities that have maximum theoretical emissions of volatile organic compounds (VOC) from all printing presses greater than 50 tons per year. NPC is licensed to 24.9 tons per year, however, its maximum theoretical emissions (without pollution control) is greater than 50 tons per year. NPC will meet the applicable standards, recordkeeping, and reporting as described in 06-096 CMR 132.

E. Bag Machines

NPC operates five bag machines that cut and seal polyethylene film into finished bags. This process creates small amounts of smoke at times which is vented off the machines. It was concluded that the small amount of smoke coming from the bag machines was at an undeterminable level of VOC. In January of 2006, NPC installed Smog Hogs (manufactured by United Air Specialists) which filters and cleans smoke electrostatically. These units electrically charge even microscopic contaminants and then capture them in the ESP collection cells. NPC eliminated the prior roof top stacks that vented emissions from the bag machines and now vent the bag machines inside through these units.

F. Regenerative Thermal Oxidizer (RTO) Installation

NPC installed an RTO to reduce VOC and HAP emissions emitted from the printing of their polyethylene bags. The RTO is a Millennium 10,000 unit with a capacity of handling 172 pounds per hour of solvent, which would far exceed the current production at the facility's three printing presses. The RTO system also reduces odor associated with the VOC emissions. It combines high temperature thermal oxidation with a regenerative heat exchange to efficiently convert VOCs and other odor causing organic compounds to carbon dioxide and water vapor.

The RTO consists of two (2) energy recovery columns connected by a high temperature combustion chamber. Flow is directed through the unit by pneumatic valves such where one column is in a gas-heating (inlet) mode and the other column is in a gas-cooling (outlet) mode. VOC-laden air enters the oxidizer through the inlet header and is fed into the base of the first column where it passes vertically up through ceramic heat exchange media and is preheated almost to the combustion chamber temperature. The burner in the combustion chamber raises the air temperature to the operating set point where the oxidation process is completed. Hot purified air then enters column B and passes vertically down through the ceramic media and is cooled before exhausted to atmosphere.

G. BPT Analysis for the RTO

NPC was not required to install add-on pollution control when its original air emissions license A-894-71-A-N was issued October 12, 2006. Due to the high air volume and low VOC concentration associated with the process at NPC, add-on control technology was not feasible for the facility at that time. Therefore, a VOC limit of 39 tons per year was established in the orginal air license as BACT for the facility, based on material usage and VOC content.

Due to an increase in printing production since the time of NPC's initial license issuance and future projections for even greater production increases, NPC proposed to control VOC and HAP through the operation of an RTO (licensed in 2008 through Air Emission License Amendment A-894-71-B-A). This allowed for production flexibility and room for future company growth while maintaining a status of a minor source per 06-096 CMR 115 of the Department's regulations. The RTO provides NPC the flexibility to run more efficiently, running all three presses with solvent inks when necessary and the flexibility to run water-based ink as well. It also assists in maintaining accurate records since the unit records what is actually going through the system. The RTO has baffles which can block air flow from the presses that are operating with water based inks, therefore, NPC can operate some presses with solvent inks and some with water based inks. Only the presses that operate with solvents need to be ducted to the RTO.

An additional benefit is the heat exchange system which has decreased the use of propane on the presses by up to fifty percent. The RTO uses a regenerative heat exchanger to capture energy used during the thermal oxidation process and return it to the incoming process exhaust. Therefore, this unit uses less energy to complete the oxidation process than traditional thermal oxidizers.

The worst case projection for emissions is running all three presses with 100% solvent ink at 105 pounds per hour maximum. Based on VOC and HAP information from Material Safety Data Sheets (MSDS), the facility running 20 hours per day, six days per week, 50 weeks per year, and with an RTO operating at 95% control, NPC estimates that worst case emissions of VOC is approximately 19 tons per year. The facility will most likely never run at these high production and solvent use levels and the RTO will likely operate closer to 98% control efficiency.

To meet BPT, the RTO shall maintain a minimum destruction efficiency of 95% and the RTO shall be operated with a set temperature of at least 1350°F.

RTO General Criteria	
Measurement Method	Temperature is monitored with thermocouples.
Indicator Range	Temperature at the chamber exits are maintained above 1350°F. If the temperature drops below this threshold, the system is shut down until the problem is identified and repairs are completed. The excursion is reported.

Performance Criteria	
Data Representativeness	Thermocouples installed at the chamber exit per manufacturer's design. Thermocouples are accurate to within +/- 40°F.
QA/QC	Inspections of the RTO, including thermocouples, are performed monthly. Annual calibrations on the thermocouples are performed in accordance with manufacturer recommendations.
Monitoring Frequency	Temperatures are measured continuously *
Data Collection Procedure	Temperature is recorded continuously on a chart recorder with a minimum sensitivity of <10°F.

* The temperature recordings are identified as a Parameter Monitor. Each parameter monitor must record accurate and reliable data. If the parameter monitor is recording accurate and reliable data less than 98% of the source operating time within any quarter of the calendar year, the Department may initiate enforcement action and may include in that enforcement action any period of time that the parameter monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction of the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions.

The RTO is initially fired using a 2.3 MMBtu/hr propane burner. The burner is designed to fire at cold start-up at approximately 18 gallons/hour. Cold startup up time is estimated from the manufacturer to last about 2 hours to reach temperature. Once the unit is at temperature, the average consumption will be less than 1 gallon per hour. The RTO manufacturer and NPC expect the combustion of VOC to maintain the necessary heat for proper RTO operation, thereby significantly decreasing propane usage.

H. Fugitive VOC Emissions

Fugitive VOC emissions from the ink storage area are minimal, however, any losses will be accounted for in the monthly inventory and material balance required to determine VOC emissions. BACT for the ink storage is covering containers with vapor tight lids on fresh or spent VOC and cleanup materials.

I. General Process Emissions

Visible emissions from any general process source shall not exceed an opacity of 20% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period.

J. Annual Emissions

1. Total Annual Emissions

NPC shall be restricted to the following annual emissions, based on a 12 month rolling total. The tons per year limits are calculated based on facility-wide

material balances of solvents and inks use. Based on the maximum propane fuel use of 176,000 gallons per year to the 2.3 MMBtu/hr propane-fired burner and the operation of the RTO at 95% destruction efficiency, the following table shows the facility's licensed allowed annual emissions.

Total Licensed Annual Emissions for the Facility
(used to calculate the annual license fee)

Pollutant	Total (tons/year)
PM	0.1
PM_{10}	0.1
SO_2	0.2
NO_x	1.1
CO	0.3
VOC	24.9
Single HAP	9.9
Combined HAP	24.9

2. Greenhouse Gases
Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans,* 40 CFR Part 52, Subpart A, §52.21 Prevention of Significant Deterioration of Air Quality rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following gases: Carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO_2e).

Based on the facility's fuel use limit(s), the worst case emission factors from AP-42, IPCC (Intergovernmental Panel on Climate Change), and *Mandatory Greenhouse Gas Reporting*, 40 CFR Part 98, and the global warming potentials contained in 40 CFR Part 98, NPC is below the major source threshold of 100,000 tons of CO_2e per year. Therefore, no additional licensing requirements are needed to address GHG emissions at this time.

III. AMBIENT AIR QUALITY ANALYSIS

The level of ambient air quality impact modeling required for a minor source shall be determined by the Department on a case-by case basis. In accordance with 06-096 CMR 115, an ambient air quality impact analysis is not required for a minor source if the total emissions of any pollutant released do not exceed the following levels and there are no extenuating circumstances:

Pollutant	Tons/Year
PM_{10}	25
SO_2	50
NO_x	50
CO	250

The total facility licensed emissions are below the emission levels contained in the table above and there are no extenuating circumstances; therefore, an ambient air quality impact analysis is not required as part of this license.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-894-71-C-R subject to the following conditions.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S.A. §347-C).

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115. [06-096 CMR 115]

(3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if

construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 CMR 115]

(4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 CMR 115]

(5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353-A. [06-096 CMR 115]

(6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 115]

(7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 CMR 115]

(8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 CMR 115]

(9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 CMR 115]

(10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 CMR 115]

(11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

A. perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:

1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
2. pursuant to any other requirement of this license to perform stack testing.

B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

C. submit a written report to the Department within thirty (30) days from date of test completion.

[06-096 CMR 115]

(12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:

A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[06-096 CMR 115]

(13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 115]

(14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emissions and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall

report all excess emissions in the units of the applicable emission limitation. [06-096 CMR 115]

(15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 CMR 115]

SPECIFIC CONDITIONS

(16) **Boiler # 1**

A. Fuel

1. Prior to July 1, 2016 or the date specified in 38 MRSA §603-A(2)(A)(3), the #2 fuel oil fired in the boiler shall be ASTM D396 compliant (max. sulfur content of 0.5% by weight). [06-096 CMR 115, BPT]
2. Beginning July 1, 2016 or on the date specified in 38 MRSA §603-A(2)(A)(3), the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.005% by weight (50 ppm). [38 MRSA §603-A(2)(A)(3)]
3. Beginning January 1, 2018 or on the date specified in 38 MRSA §603-A(2)(A)(3), the facility shall fire #2 fuel oil with a maximum sulfur content limit of 0.0015% by weight (15 ppm). [38 MRSA §603-A(2)(A)(3)]
4. Compliance shall be demonstrated by fuel records from the supplier showing the type and the percent sulfur of the fuel delivered (if applicable). [06-096 CMR 115, BPT]

B. Visible emissions from Boiler #1 shall not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [06-096 CMR 101]

(17) NPC shall comply with all applicable requirements of 06-096 CMR 132 of the Department's regulations (Graphic Arts-Rotogravure and Flexography), including Section 5 (compliance by control equipment) and Section 7 (the requirements for recordkeeping and reporting). [06-096 CMR 132]

(18) Visible emissions from the dryers firing propane shall not exceed 10% opacity on a six minute block average basis. [06-096 CMR 101]

(19) **VOC Emissions/Recordkeeping:** [06-096 CMR 132 and 06-096 CMR 115, BPT]

A. NPC shall comply with the recordkeeping requirements of 06-096 CMR 132 of the Department's regulations by compiling monthly quantities and VOC content of alcohol and ink used as a total rather than press-by-press basis.

B. NPC shall operate an RTO to reduce VOC and HAP emissions. The RTO shall be operated whenever solvent inks are used on the press. The presses that operate with water-based inks do not have to be ducted to the RTO.

C. The RTO shall achieve 95% destruction of VOCs from the dryers of the three printing presses. Compliance with the destruction efficiency shall be demonstrated by an initial stack test within 180 days of installation and every five years thereafter in accordance with 40 CFR Part 60, Appendix A, Method 25A.

D. The RTO shall maintain a temperature of at least 1350°F. Compliance shall be demonstrated by thermocouples (that shall not be in direct contact with the auxiliary burner flame) maintained at the incinerator chamber exit. The temperature shall be recorded continuously and meet the parameter monitor uptime requirement.

E. NPC shall limit VOC emissions from the facility to 24.9 tons per year based on a 12-month rolling total. Records of solvent and ink VOC content and usage, along with the VOC destruction efficiency of the RTO, shall be maintained to document compliance with this limit on a monthly and 12 month rolling total basis.

F. Total HAP emissions from the facility shall not exceed 9.9 tons/year for any single HAP and/or 24.9 tons per year for total combined HAP. (12 month rolling total). Compliance shall be demonstrated by record keeping including total usage and HAP content, and taking into account the destruction efficiency of the RTO.

G. NPC shall operate the RTO such that the visible emissions from the stack does not exceed 10% opacity on a six (6) minute block average basis.

(20) NPC shall maintain electrostatic filters to clean smoke vented from the bag machines. Daily inspections shall be logged to determine proper operation of the ESP collection units whenever the bag machines are operating.
[06-096 CMR 115, BPT]

(21) A monthly record shall be maintained to document use and composition of cleanup solvents. [06-096 CMR 115, BPT]

(22) A copy of this Order shall be kept on-site and the operator(s) must be familiar with the terms of the Order. [06-096 CMR 115, BPT]

(23) **Storage**
Fugitive VOC emissions shall be minimized by covering containers with vapor tight lids on fresh or spent VOC and cleanup materials. [06-096 CMR 115, BPT]

(24) **General Process Sources**
Visible emissions from any general process source shall not exceed an opacity of 20% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. [06-096 CMR 101]

(25) **Parameter Monitor**
Each parameter monitor must record accurate and reliable data. If the parameter monitor is recording accurate and reliable data less than 98% of the source operating time within any quarter of the calendar year, the Department may initiate enforcement action and may include in that enforcement action any period of time that the parameter monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction of the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions. [06-096 CMR 115, BPT]

(26) NPC shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS 1 DAY OF November , 2013.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Mare Allen Robert Cone for
PATRICIA W. AHO, COMMISSIONER

The term of this license shall be ten (10) years from the signature date above.

[Note: If a complete renewal application, as determined by the Department, is submitted prior to expiration of this license, then pursuant to Title 5 MRSA §10002, all terms and conditions of the license shall remain in effect until the Department takes final action on the renewal of the license.]

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: July 18, 2011
Date of application acceptance: July 22, 2011

Date filed with the Board of Environmental Protection:

This Order prepared by Edwin Cousins, Bureau of Air Quality

Filed
NOV 1 2013
State of Maine
Board of Environmental Protection